

EXHIBIT 3
REDACTED VERSION OF
DOCUMENT SOUGHT TO
BE FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.;) 17-cv-00939-WHA
OTTOMOTTO, LLC; OTTO TRUCKING LLC,)
Defendants.)
_____)

HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

VIDEOTAPED DEPOSITION OF JENNIFER HAROON

San Francisco, California

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Volume I

Reported by:

MARY J. GOFF

CSR No. 13427

Job No. 2664313

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1 involved in that process? 05:12:45

2 A I do not, no. 05:12:49

3 Q And you said that [REDACTED] [REDACTED]

4 [REDACTED]; is that correct? 05:12:54

5 A That's correct. 05:12:58

6 Q Okay. Do you remember [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED] 05:13:06

9 Q Okay. [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED] 05:13:28

14 Q Okay. And when did that process start? 05:13:30

15 A [REDACTED], but I don't 05:13:38

16 remember the exact date. 05:13:41

17 Q And who else was involved? 05:13:45

18 A Chris Urmson, Dmitri Dolgov, Dave 05:13:51

19 Ferguson, Anne Widera, Cynthia Kwon from my team for 05:13:55

20 a specific -- for a short time. John Krafcik, once 05:14:02

21 he had joined from the -- so that's from the 05:14:07

22 self-driving car side. 05:14:11

23 Q And then from the Google side? 05:14:13

24 A [REDACTED] I believe his last 05:14:17

25 name is [REDACTED], but I'm not 100 percent sure. There 05:14:28

1	were some analysts from the Corp. dev team. I can't	05:14:32
2	remember their names right now. One other	05:14:37
3	principal, but I can't remember his name either.	05:14:45
4	Q Do you remember the role?	05:14:48
5	A I believe he was at the principal level.	05:14:51
6	Q What was [REDACTED] role in that	05:14:56
7	evaluation process?	05:15:00
8	A I would say he led the day-to-day.	05:15:05
9	Q He led the day-to-day on the Google X	05:15:11
10	side -- or on the Google side --	05:15:13
11	A Yes --	05:15:14
12	Q -- or overall?	05:15:14
13	A For the Google side, yes.	05:15:16
14	Q Okay. And do you know what [REDACTED]	05:15:19
15	job title is.	05:15:20
16	A I believe it's director, but I'm not	05:15:22
17	100 percent sure.	05:15:24
18	Q And who led the day-to-day on the	05:15:29
19	self-driving side?	05:15:32
20	A I would say Chris.	05:15:37
21	Q Anybody else?	05:15:43
22	A As the leader?	05:15:45
23	Q Um-hum.	05:15:48
24	A No. I -- I would say Chris --	05:15:48
25	Q Okay.	05:15:51

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1 Q And do you recall [REDACTED] [REDACTED]
[REDACTED]
[REDACTED]? 05:17:56
4 A I don't. I mean -- yeah. 05:17:59
5 Q Is it fair to say it would have been 05:18:06
6 whatever [REDACTED]? 05:18:07
7 A That's -- 05:18:10
8 MS. BAILY: Object to form. 05:18:10
9 A -- fair to say. Sorry. That's likely. 05:18:11
10 Q Okay. Is there a possibility that there 05:18:14
11 would have been [REDACTED] [REDACTED]
[REDACTED]? 05:18:22
13 MS. BAILY: Object to form. 05:18:26
14 A [REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] 05:18:53
21 Q Do you recall [REDACTED] [REDACTED]
[REDACTED]? 05:18:59
23 MS. BAILY: Object to form. 05:19:00
24 A I don't -- I mean, what would you 05:19:04
25 describe -- what would you call significant? 05:19:13

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1 Q Anything that you would consider 05:19:16
2 significant for purposes of this question. 05:19:18
3 MS. BAILY: Object to form. 05:19:22
4 A [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] 05:19:57
9 Q Okay. [REDACTED] [REDACTED]
[REDACTED] [REDACTED]? 05:20:01
11 A Yes. 05:20:04
12 Q Okay. And do you recall [REDACTED] [REDACTED]
[REDACTED] [REDACTED]? 05:20:08
14 A I do recall that we found a mistake -- a 05:20:13
15 small mistake, so we fixed that. But it -- 05:20:16
16 Q Okay. 05:20:18
17 A -- was -- it was -- didn't have a big 05:20:18
18 impact. 05:20:21
19 Q Anything else? 05:20:21
20 A Like I said, we -- there were other -- 05:20:26
21 there were other changes during that time that I do 05:20:27
22 believe we made, but I don't remember the substance 05:20:30
23 of all of them. 05:20:32
24 Q Okay. Do you remember the substance of 05:20:33
25 any of them? 05:20:35

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1 A No. 05:20:35

2 Q Okay. [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED]? 05:20:43

4 A That's correct. 05:20:48

5 Q Who in the self-driving team was the -- 05:20:48

6 within the self-driving team, was there a principal 05:20:50

7 point of contact with [REDACTED]? 05:20:53

8 A I would say Chris. 05:21:01

9 Q Anybody else? 05:21:04

10 A Myself. 05:21:05

11 Q And then who were your contacts -- 05:21:11

12 contacts at [REDACTED]? 05:21:13

13 A So the primary -- the lead was a gentleman 05:21:21

14 named [REDACTED] And I can't remember his last name. And 05:21:23

15 I don't remember the name of his team members. 05:21:28

16 Q Do you remember anybody else from [REDACTED] [REDACTED]

17 [REDACTED]? 05:21:31

18 A No. There were at least two other people. 05:21:32

19 Q Okay. And can you describe what -- what 05:21:37

20 [REDACTED] did as part of this process? 05:21:47

21 A So you know, [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] 05:22:12

1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] 05:22:54
9 Q Okay. Do you recall [REDACTED] [REDACTED]
[REDACTED] [REDACTED]? 05:23:07
11 A I don't recall [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] 05:23:28
15 Q Do you recall any others? 05:23:39
16 A Not off the top of my head. 05:23:43
17 Q How was [REDACTED]? 05:23:44
18 MS. BAILY: Object to form. 05:23:45
19 A [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] 05:24:04
24 Q And by [REDACTED] [REDACTED]
[REDACTED] [REDACTED] is that correct? 05:24:15

1 A That's correct. 05:24:18

2 Q Okay. [REDACTED] [REDACTED]

3 [REDACTED] -- 05:24:21

4 MS. BAILY: Object to form. 05:24:23

5 Q -- [REDACTED]? 05:24:24

6 A [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED] 05:24:48

11 Q You also [REDACTED] [REDACTED]

12 [REDACTED], correct? 05:24:55

13 A That's correct. 05:24:56

14 Q Okay. [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]? 05:25:08

17 A So as I mentioned previously, [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED] [REDACTED]

25 [REDACTED] [REDACTED]

26 [REDACTED] [REDACTED]

27 [REDACTED] [REDACTED]

28 [REDACTED] [REDACTED]

29 [REDACTED] [REDACTED]

30 [REDACTED] [REDACTED]

05:25:39

1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] 05:26:14
9 Q And so as a result of all this work, [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] ? 05:26:31
13 MS. BAILY: Object to form. 05:26:33
14 A I don't [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] 05:26:56
18 Q Do you recall [REDACTED]
[REDACTED] 05:27:00
20 MS. BAILY: Object to form. 05:27:02
21 A I don't remember [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]. 05:27:12
24 THE COURT REPORTER: Did you say [REDACTED]
[REDACTED] ? 05:27:25

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1 I, MARY J. GOFF, CSR No. 13427, Certified
2 Shorthand Reporter of the State of California,
3 certify;

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth, at
6 which time the witness declared under penalty of
7 perjury; that the testimony of the witness and all
8 objections made at the time of the examination were
9 recorded stenographically by me and were thereafter
10 transcribed under my direction and supervision; that
11 the foregoing is a full, true, and correct
12 transcript of my shorthand notes so taken and of the
13 testimony so given;

14 That before completion of the deposition,
15 review of the transcript () was (XX) was not
16 requested: () that the witness has failed or
17 refused to approve the transcript.

18 I further certify that I am not financially
19 interested in the action, and I am not a relative or
20 employee of any attorney of the parties, nor of any
21 of the parties.

22 I declare under penalty of perjury under the
23 laws of California that the foregoing is true and
24 correct, dated this 27th day of July, 2017.

25 

MARY J. GOFF, CSR No. 13427